

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

UNITED STATES OF AMERICA)

)

VS.)

DOCKET No.: 0102 1:19CR00077-1-LM

)

CHINEDU Ihejiere)

SENTENCING MEMORANDUM

The Defendant Chinedu Ihejiere (Ihejiere) hereby submits this memorandum in order to assist this Honorable Court in reaching the appropriate sentence in this matter. On June 3, 2019 he was charged with Conspiracy to Commit Bank Fraud, in violation of 18 U.S.C. s 1349 and 1344. He has accepted full responsibility for his actions, agreed to plead guilty, and a written plea agreement was signed. He is adamant about the fact that he only received less than \$10,000.00 from the illegal acts that he was involved in [REDACTED]

[REDACTED] [REDACTED]
[REDACTED]

FACTS AND BACKGROUND

Ihejiere's Personal and Family Data are correctly stated in the Government's Presentencing Report. The Defendant who suffered from kidney failure in 2011, was fortunate to receive a kidney transplant in March 2018. Even though the surgery was successful, he still has to be careful and submit to regular monitoring in order to avoid any complications associated with transplant procedures. In addition he suffers from an aneurysm on his right temple as well as a heart murmur. He presently suffers from daily headaches which last a few hours before subsiding.

SENTENCING

[REDACTED]
[REDACTED] I respectfully request that this Honorable Court consider ordering a suspended sentence of two years. Should the Court not be amenable to such a disposition then in the alternative he could be sentenced to home confinement, thus allowing him to be supervised for his health problems by his medical providers.

Dated: 9/19/19

Respectfully submitted,

Chinedu Ihejiere
By and through his Attorney,

/s/ Marcel J. Murad

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct of copy of the foregoing motion was served by ECF and regular mail to:

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Dated: **9/19/19**

/s/ Marcel J. Murad

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